

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

RIKI PAUL JOHNSON,

Plaintiff,

v.

ASHLEY ELIZABETH FLIEHR a/k/a  
ASHLEY FLAIR, a/k/a CHARLOTTE  
FLAIR, RICHARD MORGAN FLIEHR  
a/k/a RIC FLAIR, a/k/a “NATURE BOY”  
FLAIR, BRIAN SHIELDS, and WORLD  
WRESTLING ENTERTAINMENT, INC.  
d/b/a the “WWE”,

Defendants.

**CASE NO. 3:18-cv-00565-GCM**

**DEFENDANT WORLD WRESTLING ENTERTAINMENT, INC.’S MOTION FOR  
EXTENSION OF TIME TO MOVE, PLEAD  
OR OTHERWISE RESPOND TO PLAINTIFF’S COMPLAINT**

Defendant World Wrestling Entertainment, Inc. d/b/a “WWE” (“WWE”), pursuant to Rule 6 of the Federal Rules of Civil Procedure, respectfully moves the Court for an extension of time of thirty (30) days, up to and including December 3, 2018, within which to answer, plead or otherwise respond to Plaintiff’s Complaint. In support of this motion, Defendant WWE shows the following:

1. Defendant WWE received a copy of the Complaint in this action by certified mail on or after October 12, 2018, but received no Summons related to the Complaint.
2. Defendant WWE has not been properly served with a copy of the Summons and Complaint in this action.

3. The time within which Defendant WWE may answer, plead or otherwise respond to Plaintiff's Complaint has not yet expired.

4. In order to be certain it is in compliance with F.R.Civ.P. 81(c), Defendant WWE seeks a 30-day extension of time in which to file its Answer or to otherwise respond to the Complaint in this action, up to and including December 3, 2018.

5. Undersigned counsel was retained by Defendant WWE on October 26, 2018 and made its first appearance in this case on November 2, 2018. Defendant WWE is in need of additional time within which to answer, plead or otherwise respond to Plaintiff's Complaint.

6. This motion is made for good cause and not for purposes of undue delay.

WHEREFORE, Defendant World Wrestling Entertainment, Inc. d/b/a "WWE" respectfully requests that the Court grant it a thirty (30) day extension of time through and including December 3, 2018 in which to answer, plead or otherwise respond to Plaintiff's Complaint.

This the 2nd day of November, 2018.

/s/Jonathan E. Buchan

Jonathan E. Buchan, N.C. State Bar No. 8205  
Natalie D. Potter, N.C. State Bar No. 34574  
Attorneys for Defendant World Wrestling  
Entertainment, Inc., d/b/a "WWE", Brian  
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### **CERTIFICATE OF SERVICE**

I hereby certify I electronically filed this above Motion For Extension Of Time To Move, Plead Or Otherwise Respond To Plaintiff's Complaint through the CM/ECF system, which will send a notice of electronic filing to:

Riki Paul Johnson  
[BohdiWest@gmail.com](mailto:BohdiWest@gmail.com)  
*Pro Se Plaintiff*

I hereby certify that I also served this above Motion upon Plaintiff by email to the address above.

This the 2nd of November, 2018.

/s/Jonathan E. Buchan  
Jonathan E. Buchan, N.C. State Bar No. 8205  
Attorney for Defendant World Wrestling  
Entertainment, Inc., d/b/a "WWE", Brian  
Shields and Richard Morgan Fliehr a/k/a Ric  
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